

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CHEVRON CORPORATION,  
Plaintiff,  
v.  
STEVEN DONZIGER, THE LAW  
OFFICES OF STEVEN R. DONZIGER,  
et al.,  
Defendants.

CASE NO. 11-CV-0691(LAK)

**DECLARATION OF CRAIG SMYSER IN SUPPORT OF  
DEFENDANTS HUGO GERARDO CAMACHO NARANJO AND  
JAVIER PIAGUAJE PAYAGUAJE'S MOTION TO SUPPLEMENT  
THE SUMMARY JUDGMENT RECORD WITH NEW EVIDENCE**

I, Craig Smyser, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am a partner at the law firm of Smyser Kaplan & Veselka, L.L.P., counsel for Defendants Hugo Gerardo Camacho Naranjo and Javier Piaguaje Payaguaje ("Defendants") in the above-captioned matter. I make this declaration based on personal knowledge and in support of Defendants Hugo Gerardo Camacho Naranjo and Javier Piaguaje Payaguaje's Motion to Supplement the Summary Judgment Record with New Evidence.

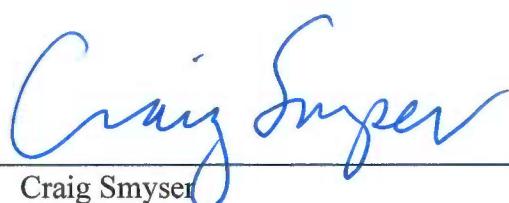
2. Attached hereto as Exhibit 1 is a true and correct copy of the March 28, 2013 Declaration of Nicolás Augusto Zambrano Lozada, along with a certified English translation and all exhibits thereto, including audio files on a compact disc to be filed publicly with the Court.

3. Attached hereto as Exhibit 2 is a true and correct copy of a certified transcription and translation into English of the audio file referenced in paragraph 20 of the March 28, 2013 Declaration of Nicolás Augusto Zambrano Lozada.

4. Attached hereto as Exhibit 3 is a true and correct copy of a certified transcription and translation into English of the audio file referenced in paragraph 21 of the March 28, 2013 Declaration of Nicolás Augusto Zambrano Lozada.

Dated: April 4, 2013.  
Houston, Texas

By:



Craig Smyser  
*Admitted Pro Hac Vice*  
Federal ID 0848